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ENVIRONMENTAL CONSULTANTS

Report: Weekly Progress Report

Project: Former North Plant MGP Site

Removal Action Construction

Waukegan, Illinois

Date: June 18, 2014

Prepared By: Natural Resource Technology, Inc.

Andrew Millspaugh, EIT

Glenn Luke, PE

Submitted To: Integrys Business Support, LLC

Naren M. Prasad, PE

Activity Period: June 9, 2014 through June 14, 2014

Natural Resource Technology, Inc. Personnel on Site

- Andrew Millspaugh, Field Engineer
- Dan Vachon, Field Technician
- Mark Walter, Field Engineer
- Glenn Luke, Project Manager
- Todd Lewis, Construction Manager
- Steve Wiskes, Health & Safety Manager

USEPA Personnel on Site

- Fernando Monterey, OTIE
- Brad Benning, On-Scene Coordinator

Integrys/North Shore Gas Personnel on Site

■ None

Subcontractors on Site

- Geo-Solutions, Inc. (GSI), Earthwork, In Situ Solidification/Stabilization
- James Anderson Co., Designated Erosion Control Inspector

Others

Burns & McDonnell, Perimeter Air Monitoring

Visitors

None

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This report summarizes field activities performed by NRT, in addition to NRT's subcontractors, on behalf of IBS at the former North Plant MGP Site Time Critical Removal Action:

Site Activities

Removal Action Totals:

- Direct Disposal (Soil and Debris) through 6/14/14: 57,822.31 Tons
- In Situ Solidification/Stabilization (ISS) through 6/14/14: 252,457.46 Cubic Yards

NRT

- Managed site security and construction activities with IBS, GSI, WMI, and Burns & McDonnell.
- Facilitated and participated in daily safety meetings to evaluate potential safety concerns for the day's planned construction activities.
- Management and oversight of GSI's construction efforts throughout the week.
- Management and oversight of GSI during full-scale ISS construction in Removal Action Areas A and B with 12% reagent addition.
- Coordination and scheduling of disposal trucks with WMI and GSI.
- Issued truck tracking forms and documented 168 loads (3,189.91 tons) of soil and debris for disposal at Waste Management's Countryside Landfill in Grayslake, IL (Countryside Landfill).
- Prepared Construction Quality Assurance (CQA) samples from full-scale ISS (12 samples) for unconfined compressive strength (UCS) (ASTM D1633) and hydraulic conductivity (ASTM D5084) laboratory testing by Timely Engineering Soil Tests (T.E.S.T.). Test results to be compared to ISS performance goals established in the Removal Action Work Plant (RAWP).
- Received and reviewed ISS CQA sample test results for unconfined compressive strength (UCS) (ASTM D1633) and hydraulic conductivity (ASTM D5084). Laboratory testing is completed by Timely Engineering Soil Tests (T.E.S.T.). Test results are compiled and compared to the ISS performance goals established in the Removal Action Work Plan (RAWP).
- Construction survey verification of ISS column locations and elevations, pertinent site features, Removal Action Areas, historical foundations, etc.
- Accompanied James Anderson Co. during a weekly erosion control inspection on Thursday (6/12).
- Monitored site conditions for traffic flow, fugitive dust, odors, and general overall safety.
- Conducted periodic worker health and safety air monitoring in the work zone.
- Responded to local odor complaints by implementing additional fugitive emission controls including additional Rusmar odor control foam, additional covering of inactive stockpiles, operation of an odor control perimeter misting system, and sequencing of work to minimize material handling.

Geo-Solutions Inc.

- Continued full-scale ISS construction in Removal Action Areas A and B with 12% reagent addition.
 10,432.12 cubic yards of ISS was completed.
- Received 48 loads of ground granulated blast furnace slag (GGBFS) and 16 loads of Portland cement for full-scale ISS construction.
- Loaded 3,189.91 tons (168 loads) of soil and debris for direct disposal at Countryside Landfill.

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- Implemented fugitive emission controls during shallow soil excavation, subsurface structure demolition and removal, and offsite trucking. Emission controls include water for dust suppression, Rusmar foam for odor and VOC emissions, and stockpile covering with scrim reinforced plastic.
- Implemented additional fugitive emission controls including additional Rusmar odor control foam, additional covering of inactive stockpiles, and sequencing of work to minimize material handling in response to local odor complaints.
- Maintained and administered site exclusion zones, decontamination areas, and site health and safety procedures.
- Conducted worker health and safety air monitoring in the work (exclusion) zone.

James Anderson Company

 Completed a weekly erosion control inspection on Thursday (6/12). The inspections were performed in accordance with the Watershed Development Permit and the general National Pollutant Discharge Elimination System (NPDES) permit.

Changes to Scope of Work

None

Open/Outstanding Items

None

Work planned for the week of June 16, 2014 through June 21, 2014

- Perform perimeter Air Monitoring.
- Full-scale ISS construction in Removal Action Areas A and B with the Manitowoc 4000w and Delmag RH-28.
- Complete ISS construction in the area of the Former Waukegan Tar Pit on NSG property.
- Receive and evaluate ISS CQA data.
- Grade ISS swell material to final design elevations in Removal Action Area A.

A Weekly Progress Report will be issued throughout the duration of field activities for this Time Critical Removal Action. A written report summarizing the results of the Removal Action will be provided following completion of all field activities. A summary of the perimeter air monitoring activities, as detailed by the Air Monitoring Contractor, is included with this report as Attachment 1.

Please contact us if you have any questions.

Sincerely,

NATURAL RESOURCE TECHNOLOGY, INC.

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Glenn Luke, PE

Environmental Engineer

Attachment 1: Burns and McDonnell Weekly Air Monitoring Report

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Field Photos:



Photo 1: Grading of ISS swell material to final design elevations in Removal Action Area A.

Direction: East

Photo Date: 6/12/14

Photo Taken By: DJV



Photo 2: Operating perimeter odor control misting system on west fence along Pershing Road.

Direction: South

Photo Date: 6/13/14

Photo Taken By: AMM



Photo 3: Application of odor suppressant foam to active areas of construction in Removal Action Area A.

Direction: South

Photo Date: 6/14/14

Photo Taken By: AMM





Record of Weekly Ambient Air Monitoring Activities Former North Plant MGP Site

Date Period: June 9 - 15, 2014

Burns & McDonnell is performing ambient air monitoring and sampling along the site perimeter at the Former North Plant MGP Site in accordance with the *North Plant MGP Site – Removal Action Work Plan (RAWP)*. We are completing real time ambient air monitoring 24-hours a day, seven days a week at seven locations (AMS-1 through AMS-7) along the Site perimeter. We are collecting 24-hour perimeter air samples at upwind and downwind locations at the Air Monitoring Stations on a routine basis at frequencies and quantities outlined in the RAWP. Burns & McDonnell is also performing real-time handheld and observation monitoring as described in the RAWP. This weekly report describes air monitoring activities for the week of June 9-15, 2014 and includes:

Tasks	Ambient Air Monitoring Activities
Sampling Activities Performed	A total of 8 SUMMA canister air samples and 4 PUF air samples were collected and submitted to STAT Analysis for BTEX/Naphthalene and select PAH analyses, respectively.
BMcD Field Personnel	Ross Hartwick Josh Myers Jason Wuerch
Equipment Deployed	AirLogics Air Monitoring Stations SUMMA canisters with 24-hour flow regulators PUF sampling systems Photo ionization detector (PID) TSI Dusttrak monitoring device

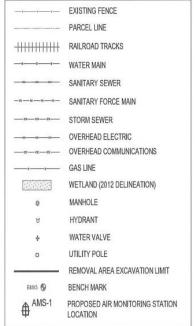
Perimeter Ambient Air Monitoring Results:

Real-time Perimeter Ambient Air Monitoring data for the week June 9 – 15, 2014 will be uploaded to the Burns & McDonnell MFT site and emailed to Brad Benning and Kevin Adler of the US Environmental Protection Agency (EPA). Real-time Perimeter Ambient Air Analytical Results are attached to this Weekly Report updated through June 5, 2014. The laboratory analytical reports will also be uploaded to the MFT site for the samples collected on June 3 and June 5, 2014.

All Real-time Perimeter Ambient Air Monitoring data and Analytical Results for the duration of the project through June 10, 2014 was uploaded to the Burns & McDonnell MFT site and emailed to Brad Benning and Kevin Adler on June 11, 2014. A thumb drive containing the same data was shipped to Brad Benning of the US EPA on June 11, 2014 for Friday June 12, 2014 delivery.

Figure 1: Site Map







SOURCE NOTES:

- THIS DRAWING WAS DEVELOPED FROM MCCLURE ENGINEERING & ASSOCIATES, INC. PLAT OF SURVEY, SHEET 1 OF 1, JOB NO. 02-13-12-070, DRAWING NAME 12XROPERSHING.DWG, DATED 0827/2012.

 ARTERIAL PHOTOGRAPHY TAKEN FROM BING MAPS 2012.

 COORDINATE SYSTEM IS NADAS, IL STATE PLANE EAST, US FOOT.

Table 3 Sampling Average Concentrations through June 5, 2014 Acceptable Air Concentration Screening 24-Hour Ambient Air Monitoring Data North Plant

	Acceptable Air	Acceptable Air	Acceptable Air	Sample Location/Concentration							
	Concentrations	<u>Concentrations</u>	<u>Concentrations</u>								
Compound/Analyte	at TCR* 1E-4	at TCR* 1E-5	at TCR* 1E-6	Station 1	Station 2	Station 3	Station 4	Station 5	Station 6	Station 7	
Benzene, Ethylbenzene, Toluene and Total Xylenes (BTEX) and Naphthalene (ug/m3)											
Benzene	80	80	9.0	0.820	1.300	1.574	1.425	1.267	1.164	0.832	
Ethylbenzene	2,800	280	28	0.991	1.348	2.061	2.190	1.850	1.401	1.005	
Naphthalene	30	21	2.1	4.404	6.882	11.008	<u>9.601</u>	7.288	<u>5.913</u>	3.617	
Toluene	5,000	5,000	5,000	1.714	2.195	2.209	1.734	1.658	1.906	1.693	
Xylenes, Total	400	400	400	2.584	2.991	3.361	2.960	2.838	2.929	2.693	
Polynuclear Aromatic Hydrocarbons (PAHs) (ug/m3)											
Benzo(a)anthracene	64	6.4	0.64	NC	NC	NC	NC	NC	NC	NC	
Benzo(b)fluoranthene	64	6.4	0.64	NC	NC	NC	NC	NC	NC	NC	
Benzo(k)fluoranthene	64	6.4	0.64	NC	NC	NC	NC	NC	NC	NC	
Benzo(a)pyrene	6.4	0.64	0.064	NC	NC	NC	NC	NC	NC	NC	
Chrysene	640	64	6.4	NC	NC	NC	NC	NC	NC	NC	
Dibenzo(a,h)anthracene	5.8	0.58	0.058	NC	NC	NC	NC	NC	NC	NC	
Indeno(1,2,3-cd)pyrene	64	6.4	0.64	NC	NC	NC	NC	NC	NC	NC	

Notes:

- 1) If all sample results are non-detect no average is calculated.
- 2) ug/m3 micrograms per cubic meter adjusted to standard temperature and pressure.
- 3) * TCR Target Cancer Risk
- 4) AAC Acceptable air concentrations.
- 5) Result shaded gray value exceeds AAC for TCR 1E-4.
- 6) Result bold value exceeds AAC for TCR 1E-5.
- 7) Result underlined value exceeds AAC for TCR 1E-6.
- 8) NC All sample results are non-detect; no average is calculated.

Table 4 (Continued)

24-Hour Ambient Air Data Results - Acceptable Air Concentration Screening and Cumulative Average 24-Hour Ambient Air Monitoring Data North Plant

				Sample Location and Sample Start Date/Concentration								
	Acceptable Air	Acceptable Air	Acceptable Air	Station 2		Station 3		Station 6		Station 7		
	Concentrations	Concentrations	Concentrations	6/3/2014		6/3/2014		6/3/2014		6/3/20)14	
Compound/Analyte	at TCR* 1E-4	at TCR* 1E-5	at TCR* 1E-6	Result	Avg	Result	Avg	Result	Avg	Result	Avg	
BTEX and Naphthalene (ug/m3)												
Benzene	80	80	9.0	8.4	1.300	5.7	1.575	<u>13</u>	1.164	1.0 U	0.812	
Ethylbenzene	2,800	280	28	1.9	1.348	3.8	2.079	3.2	1.401	1.5 U	0.996	
Naphthalene	30	21	2.1	<u>38</u>	6.882	<u>53</u>	10.994	<u>50</u>	<u>5.913</u>	3.8	3.426	
Toluene	5,000	5,000	5,000	16	2.195	10	2.163	21	1.906	2.1	1.613	
Xylenes, Total	400	400	400	15	2.991	11	3.375	20	2.929	4.4 U	2.641	
PAHs (ug/m3)												
Benzo(a)anthracene	64	6.4	0.64	0.015 U	NC	0.015 U	NC	0.015 U	NC	0.015 U	NC	
Benzo(b)fluoranthene	64	6.4	0.64	0.015 U	NC	0.015 U	NC	0.015 U	NC	0.015 U	NC	
Benzo(k)fluoranthene	64	6.4	0.64	0.015 U	NC	0.015 U	NC	0.015 U	NC	0.015 U	NC	
Benzo(a)pyrene	6.4	0.64	0.064	0.015 U	NC	0.015 U	NC	0.015 U	NC	0.015 U	NC	
Chrysene	640	64	6.4	0.015 U	NC	0.015 U	NC	0.015 U	NC	0.015 U	NC	
Dibenzo(a,h)anthracene	5.8	0.58	0.058	0.015 U	NC	0.015 U	NC	0.015 U	NC	0.015 U	NC	
Indeno(1,2,3-cd)pyrene	64	6.4	0.64	0.015 U	NC	0.015 U	NC	0.015 U	NC	0.015 U	NC	

Notes:

- 1) Avg Cumulative average concentration.
- 2) ug/m3 micrograms per cubic meter adjusted to standard temperature and pressure.
- 3) * TCR Target Cancer Risk
- 4) AAC Acceptable air concentrations.
- 5) Result underlined value exceeds AAC for TCR 1E-6.
- 6) Result bold value exceeds AAC for TCR 1E-5.
- 7) Result shaded gray value exceeds AAC for TCR 1E-4.
- 8) U Compound/analyte not detected. The associated numerical value is the reporting limit.
- 9) NC All sample results are non-detect; no average is calculated.

Table 4 (Continued)

24-Hour Ambient Air Data Results - Acceptable Air Concentration Screening and Cumulative Average 24-Hour Ambient Air Monitoring Data North Plant

				Sample Location and Sample Start Date/Concentration							
	Acceptable Air	Acceptable Air	Acceptable Air	Station 1		Station 3		Station 4		Station 7	
	Concentrations	Concentrations	Concentrations	6/5/2014		6/5/2014		6/5/2014		6/5/2	014
Compound/Analyte	at TCR* 1E-4	at TCR* 1E-5	at TCR* 1E-6	Result	Avg	Result	Avg	Result	Avg	Result	Avg
BTEX and Naphthalene (ug/m3)											
Benzene	80	80	9.0	3.8	0.820	1.5	1.574	2.8	1.425	2.1	0.832
Ethylbenzene	2,800	280	28	2.2	0.991	1.6 U	2.061	2.9	2.190	1.6	1.005
Naphthalene	30	21	2.1	<u>27</u>	4.404	<u>12</u>	11.008	<u>19</u>	9.601	<u>16</u>	3.617
Toluene	5,000	5,000	5,000	11	1.714	5.5	2.209	7.1	1.734	6.9	1.693
Xylenes, Total	400	400	400	11	2.584	4.8 U	3.361	6.4	2.960	6.1	2.693
	PAHs (ug/m3)										
Benzo(a)anthracene	64	6.4	0.64	NA	NC	NA	NC	NA	NC	NA	NC
Benzo(b)fluoranthene	64	6.4	0.64	NA	NC	NA	NC	NA	NC	NA	NC
Benzo(k)fluoranthene	64	6.4	0.64	NA	NC	NA	NC	NA	NC	NA	NC
Benzo(a)pyrene	6.4	0.64	0.064	NA	NC	NA	NC	NA	NC	NA	NC
Chrysene	640	64	6.4	NA	NC	NA	NC	NA	NC	NA	NC
Dibenzo(a,h)anthracene	5.8	0.58	0.058	NA	NC	NA	NC	NA	NC	NA	NC
Indeno(1,2,3-cd)pyrene	64	6.4	0.64	NA	NC	NA	NC	NA	NC	NA	NC

Notes:

- 1) Avg Cumulative average concentration.
- 2) ug/m3 micrograms per cubic meter adjusted to standard temperature and pressure.
- 3) * TCR Target Cancer Risk
- 4) AAC Acceptable air concentrations.
- 5) Result underlined value exceeds AAC for TCR 1E-6.
- 6) Result bold value exceeds AAC for TCR 1E-5.
- 7) Result shaded gray value exceeds AAC for TCR 1E-4.
- 8) U Compound/analyte not detected. The associated numerical value is the reporting limit.
- 9) NA Not analyzed.
- 10) NC All sample results are non-detect; no average is calculated.